

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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GMA ACCESSORIES, INC.,

Plaintiff,

**GMA's Request
for Documents**

Civil Action No.: 07Cv8414 (LAK)

- against -

EPARTNERS, INC.

Defendant.

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SIRS:

Plaintiff by and through its attorneys, The Bostany Law Firm, hereby requests defendant to produce copies of the documents set forth below at The Bostany Law Firm, 40 Wall Street, New York, New York 10005 pursuant to Fed.R.Civ.P. 34:

Definition:

The "Project" is defined as: design, installation, training, or any other services relating to the satisfaction of defendant's obligation to plaintiff.

- (a) Any and all documents containing information concerning GMA's needs.
- (b) Any and all documents concerning whether or not ePartners could meet those needs.

- (c) Any and all documents containing information on the Project installation of software by defendant at GMA.
- (d) Any and all emails, memos, documents, records, or writings of any kind reflecting or containing information about the lack of success of the project.
- (e) Any and all documents containing information about promises to GMA.
- (f) Any and all documents containing descriptions of what defendant promised to do for GMA.
- (g) Any and all documents containing descriptions of what defendant did for GMA.
- (h) Any and all documents containing descriptions of what defendant failed to do for GMA.
- (i) Evaluations of personnel that were assigned to work on the Project.
- (j) Employee files of personnel that were assigned to work on the Project.

Dated: New York, New York
January 7, 2008

By:

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